



Statement of Basis

Title V Air Quality Operating Permit Modification

Daktronics, Inc. –Brookings, South Dakota

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1.0 BACKGROUND

Daktronics, Inc. manufactures and paints electronic visual information display systems at its facility in Brookings, South Dakota. The primary Standard Industrial Classification code is 3993 – Miscellaneous Manufacturing Industries, Signs and Advertising Specialties.

Daktronics' Title V air quality permit was renewed on June 13, 2006. On October 9, 2007, the permit was modified to add a Tecor cross draft paint booth. The following units are covered under Daktronics' existing permit:

Unit #1	1999 JBI paint booth (Sports) coating operation, model A-44-PDT-S ¹ ;
Unit #2	1994 JBI paint booth coating operation, model AT-40-SB-S ¹ ;
Unit #3	1985 Binks contract paint booth coating operation, model CA-544-T ¹ ;
Unit #5	1991 Nordson conformal coater, model SCIR2;
Unit #6	1999 Precision Valve and Automation (PVA) conformal coater, model PVA 2000;
Unit #8	2006 Vitronics, Soltec Delta Wave, wave soldering machine, model 6622CC;
Unit #9	1998 PVA potting machine #1, model PVA 1000 / Sheepscot Model 9450;
Unit #10	1998 PVA potting machine #2, model PVA 1000 / Sheepscot Model 9450;
Unit #11	2003 Vitronics Soltec Wave Solder, wave soldering machine, model 6622CC;
Unit #12	JB I cross draft paint booth coating operation, model T-50-PDT-S ¹ ;
Unit #13	2006 Tekor series 5000 paint booth, model no. 141650 ¹ ; and
Unit #14	Tekor Series 5000 cross draft paint booth, model no. TTB-SE-14150-EI-ME. ¹

On November 17, 2008, DENR Air Quality Program staff met with representatives from Daktronics to discuss proposed changes in operation at both the Brookings and Sioux Falls manufacturing facilities. In 2005, Daktronics purchased a Cefla Falcioni Model Kleenspray automatic paint sprayer to paint louver assemblies for special Live Events Pro Star projects. The unit was originally classified as an insignificant activity because the potential volatile organic compound emissions were less than two tons per year. Daktronics has recently determined that in addition to the special Live Events Pro Star projects, it is necessary to paint the louver assemblies for all projects that require them. Therefore, the Cefla Falcioni Model Kleenspray automatic paint sprayer will no longer qualify as an insignificant activity.

Daktronics also informed the department that they are considering moving the unit to the Sioux Falls facility in late spring 2009 to take advantage of the larger available labor supply. Daktronics has submitted an application to revise the permit for Daktronics' Sioux Falls facility to add the Cefla Falcioni paint sprayer in the event it is eventually moved from Brookings to Sioux Falls.

1.1 Proposed Revisions

Daktronics submitted an application to modify the Title V air quality permit for the Brookings facility on December 11, 2008. Daktronics also requested an administrative permit amendment to change the mailing address. The permit application was considered complete on January 27, 2009. The following unit will be reviewed for coverage under the permit:

Unit #15	2005 Cefla Flacioni Kleenspray automatic paint sprayer, Model 12 ¹ . The sprayer uses an air assisted air mix method of spraying.
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¹ – Coating operation includes the equipment used to apply cleaning materials to a substrate to prepare it for coating application (surface preparation) or to remove dried coating; to apply coating to a substrate (coating application) and to dry or cure the coating after application; or to clean coating operation equipment (equipment cleaning); all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed; all manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

1.2 Insignificant Activities

The following units from the previous permit reviews each have the potential to emit less than two tons per year of a criteria pollutant. In accordance with the Administrative Rules of South Dakota (ARSD) 74:36:05:04.01(7), a unit that has the potential to emit two tons or less per year of any criteria pollutant before the application of control equipment is considered an insignificant activity and exempt from permitting.

- 1983 generic parts wash booth;
- 1998 Precision Valve and Automation hot melt machine;
- 1998 Piller House selective solder machine;
- 2000 Precision Valve and Automation silicone coater;
- 2000 Harmony 200-FS soldering machine;
- Vitronics Selective Solder machine, Model #6749;
- Foam in place gasketing machine, model DM 210 2, component dosing machine;
- 2006 Vitronics Soltec Delta Wave, wave soldering machine, Model 6622CC ;
- 2006 Vitronics Soltec Delta Wave, wave soldering machine, Model 6622CC;
- 2006 Vitronics Soltec Selective solder machine, Model #6747; and
- 2006 Vitronics Soltec Selective solder machine, Model #6749.

2.0 EMISSION FACTORS AND POTENTIAL EMISSIONS

The department uses stack test results to determine air emissions whenever stack test data are available from the source or a similar source. When stack test results are not available, the department relies on manufacturing data, material balance, EPA's Air Pollutant Emission Factors AP-42 document, or other methods to determine potential air emissions. Potential emissions for each applicable pollutant are calculated by assuming the unit operates every day of the year at the maximum design capacity.

2.1 Unit #15 – Cefla Falcioni Kleenspray automatic paint sprayer

The emission factors were derived from the material safety data sheets for the products used in the paint booth. The potential emission rate will be estimated from the amount of paint and other components (reducer, hardener, catalyst, solvent, etc.) used and the amount of time the booth is operated. Daktronics estimated that the automatic paint sprayer will operate 18 hours per day, 234 days per year (4,212 hours per year). Potential emissions are calculated assuming that the facility

operates 24 hours per day 365 days per year (8,760 hours per year). Therefore, the potential emissions for Unit #15 will be calculated by multiplying the calculated emissions by the following ratio:

$$\frac{8,760 \text{ potential operating hours/year}}{4,212 \text{ actual operating hours/year}} = 2.1$$

Daktronics estimates that 7,508 gallons of flat black PRISM[®] Acrylic Urethane and 1,404 gallons of Barsol A-4165 thinner will be used per year based on the estimated number of hours of operation. Daktronics submitted a Certified Product Data Sheet for the flat black PRISM[®] Acrylic Urethane paint. According to the information provided, the paint weighs 8.71 pounds per gallon and the VOC content is 4.46 pounds per gallon. The paint also contains a maximum of 5 percent toluene, 1 percent ethylbenzene, and 8 percent xylene by weight. Toluene, ethylbenzene, and xylene are hazardous air pollutants (HAPs). The Barsol thinner weighs 6.636 pounds per gallon and is 30 percent by weight VOCs. The thinner does not contain any HAPS. The potential VOC and HAP emissions for Unit #15 are calculated below.

Flat Black PRISM[®] Acrylic Urethane:

$$\text{VOCs} = \frac{7,508 \text{ gallons paint}}{\text{year}} \times \frac{4.46 \text{ pounds VOC}}{\text{gallon}} \times \frac{\text{ton}}{2,000 \text{ pounds}} \times 2.1 = 35.2 \text{ tons/yr}$$

$$\text{toluene} = \frac{7,508 \text{ gallons paint}}{\text{year}} \times \frac{8.71 \text{ pounds}}{\text{gallon}} \times \frac{0.05 \text{ pound toluene}}{\text{pound}} \times \frac{\text{ton}}{2,000 \text{ pounds}} \times 2.1 = 3.4 \text{ tons/yr}$$

$$\text{ethylbenzene} = \frac{7,508 \text{ gallons paint}}{\text{year}} \times \frac{8.71 \text{ pounds}}{\text{gallon}} \times \frac{0.01 \text{ pound ethylbenzene}}{\text{pound}} \times \frac{\text{ton}}{2,000 \text{ pounds}} \times 2.1 = 0.7 \text{ tons/yr}$$

$$\text{xylene} = \frac{7,508 \text{ gallons paint}}{\text{year}} \times \frac{8.71 \text{ pounds}}{\text{gallon}} \times \frac{0.08 \text{ pounds xylene}}{\text{pound}} \times \frac{\text{ton}}{2,000 \text{ pounds}} \times 2.1 = 5.5 \text{ tons/yr}$$

Barsol A-4165 Thinner:

$$\text{VOCs} = \frac{1,404 \text{ gallons}}{\text{year}} \times \frac{6.636 \text{ pounds}}{\text{gallon}} \times \frac{0.30 \text{ pounds VOC}}{\text{pound}} \times \frac{\text{ton}}{2,000 \text{ pounds}} \times 2.1 = 2.9 \text{ tons/yr}$$

POTENTIAL EMISSIONS SUMMARY

Potential emissions for each applicable pollutant are calculated by assuming that the unit operates every day of the year at the maximum design capacity. The potential uncontrolled emissions are summarized in Table #1. Addition of the automatic paint sprayer (Unit #15) will increase Daktronics' potential VOC emissions by 38.1 tons per year and the potential HAP emissions by 9.6 tons per year.

Table #1
Potential Emissions (tons/year)

Unit	VOC	HAPs
#1	30.2	14.5
#2	30.2	14.5
#3	30.2	14.5
#5	9.9	--
#6	17.0	--
#8	2.3	--
#9	2.1	--
#10	2.1	--
#11	2.2	--
#12	30.2	14.5
#13	30.2	14.5
#14	25.6	5.7
#15	38.1	9.6
TOTAL	250.3	87.8

4.0 PERMIT REQUIREMENTS

4.1 New Source Review

ARSD 74:36:10:01 states that New Source Review (NSR) regulations apply to areas of the state which are designated as nonattainment pursuant to the Clean Air Act for any pollutant regulated under the Clean Air Act. Daktronics is located in Brookings, South Dakota, which is in attainment for all the pollutants regulated under the Clean Air Act. Therefore, Daktronics is not subject to NSR review.

4.2 Prevention of Significant Deterioration (PSD)

Any stationary source which emits or has the potential to emit 250 tons per year or more of any air pollutant is considered a major source and subject to prevention of significant deterioration (PSD) requirements (ARSD 74:36:09 – 40 C.F.R. Part 52.21(b)(1)). Any stationary source which emits or has the potential to emit 100 tons per year or more of any air pollutant and is one of the 28 named PSD source categories is subject to PSD requirements (ARSD 74:36:09 – 40 C.F.R. Part 52.21(b)(1)). The following is a list of regulated pollutants under the PSD program:

- Total suspended particulate (PM);
- Particulate with a diameter less than or equal to 10 microns (PM10);

- Particulate with a diameter less than or equal to 2.5 microns (PM2.5);
- Sulfur dioxide (SO₂);
- Nitrogen oxides (NO_x);
- Carbon monoxide (CO);
- Ozone – measured as volatile organic compounds (VOCs);
- Lead;
- Fluorides;
- Sulfuric acid mist;
- Hydrogen sulfide;
- Reduced sulfur compounds; and
- Total reduced sulfur.

Daktronics is not one of the 28 named PSD source categories; therefore, the major source threshold is 250 tons per year. Prior to the proposed change, Daktronics was considered a minor source under the PSD air quality program because the potential VOC emissions were less than 250 tons per year. The increased usage of the Cefla Falcioni automatic paint sprayer increases Daktronics' potential VOC emissions above the 250 tons per year major source threshold under the PSD air quality permit program. Therefore, Daktronics is now considered a major source under the PSD air quality permit program. However, Daktronics is not required to conduct a PSD review for the proposed change because the proposed change by itself does not emit 250 tons per year or more.

Daktronics has requested enforceable operating limits in the permit to restrict the VOC emissions to less than 250 tons per year. Therefore, Daktronics is still considered a minor source under the PSD program and is not subject to a PSD review.

4.3 New Source Performance Standards

There are no New Source Performance Standards that are applicable to Daktronics' operations.

4.4 National Emission Standards for Hazardous Air Pollutants (Part 61)

The department reviewed the National Emission Standards for Hazardous Air Pollutants (NESHAP) in 40 CFR Part 61 and determined that there are no NESHAP standards applicable to Daktronics' operations.

4.5 National Emission Standards for Hazardous Air Pollutants (Part 63)

The department reviewed the maximum achievable control technology (MACT) standards and determined that the following may be applicable.

4.5.1 40 CFR, Part 63, Subpart M – National Emission Standards for Surface Coating of Miscellaneous Metal Parts and Products

The provisions of this subpart are applicable to new, reconstructed, or existing affected sources that use 946 liters (250 gallons) per year, or more, of coatings that contain hazardous air pollutants in the surface coating of miscellaneous metal parts and products and that is a major source, is located at a

major source, or is part of a major source of emissions of HAP. The affected source is the collection of the following items:

- (1) All coating operations. A coating operation means equipment used to apply cleaning materials to a substrate to prepare it for coating application (surface preparation) or to remove dried coating; to apply coating to a substrate (coating application) and to dry or cure the coating after application; or to clean coating operation equipment (equipment cleaning);
- (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed,
- (3) All manual and automated equipment and containers used for conveying coatings, thinners, and/or other additives, and cleaning materials; and
- (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

One of the three following compliance options must be used to demonstrate compliance with the applicable limit in 40 CFR §63.3890:

- (1) Compliant material option. Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit and that each thinner and/or other additive, and cleaning material used contains no organic HAP;
- (2) Emission rate without add-on controls option. Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit, calculated as a rolling 12-month emission rate and determined on a monthly basis;
- (3) Emission rate with add-on controls option. Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), and the emissions reductions achieved by emission capture systems and add-on controls, the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit, calculated as a rolling 12-month emission rate and determined on a monthly basis. If this compliance option is used, all emission capture systems and add-on controls devices for the coating operation(s) must meet the applicable operating limits and work practice standards.

All coatings, thinners and/or other additives, and cleaning materials used in the affected source must be included when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit.

A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year or any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year. Miscellaneous metal parts and products include, but are not limited to, metal components of the following types of products as well as the products themselves: motor vehicle parts and accessories, bicycles and sporting goods, recreational vehicles, extruded aluminum structural components, railroad cars, heavy duty trucks, medical equipment, lawn and garden equipment, electronic equipment, magnet wire, steel drums, industrial machinery, metal pipes and numerous other industrial, household, and consumer products.

Daktronics manufactures and paints electronic visual information display systems and is a major source of hazardous air pollutants. The coating operations associated with Units #1, #2, #3, #12, #13, #14, and #15 are subject to the requirements of this subpart. None of the units have add-on emission controls. Therefore, Daktronics must use compliance option (1) or (2) above.

In accordance with 40 CFR § 63.3882, an affected source is a new affected source if it commenced its construction after August 13, 2002, and the construction is of a completely new miscellaneous metal parts and products surface coating facility where previously no miscellaneous metal parts and products surface coating facility had existed. An affected source is reconstructed if the replacement of components of an affected source to the extent that the fixed capital cost of the new component exceeds 50 percent of the fixed capital cost that would be required to construct a comparable new source; and it is technologically and economically feasible for the reconstructed source to meet the relevant standards. An affected source is existing if it is not new or reconstructed.

Unit #15 is a coating operation at an existing affected source. The definition of a new affected source states that, "...the construction is of a completely new miscellaneous metal parts and products surface coating facility where previously no miscellaneous metal parts and products surface coating facility had existed." Therefore, Unit #15 is considered part of an existing affected source.

The emission limit for each existing general use coating affected source (Units #1, #2, #3, #12, #13, #14, and #15), is 0.31 kilogram (2.6 pounds) organic HAP per liter (gallon) coating solids used during each 12-month compliance period. The compliance date for existing affected sources was January 2, 2007.

4.6 State Emission Limits

Daktronics does not operate any processes that are subject to the state's particulate or sulfur dioxide emission limits. However, each permitted unit is required to meet the 20 percent opacity limit as required in ARSD 74:36:12:01.

4.7 Compliance Assurance Monitoring

Compliance assurance monitoring is applicable to permit applications received on or after April 20, 1998, from major sources applying for a Title V air quality permit. Compliance assurance monitoring is applicable to any unit that meets the following criteria:

1. The unit is subject to an emission limit or standard for the applicable regulated air pollutant;
2. The unit uses a control device to achieve compliance with any such emission limit or standard; and
3. The unit has potential uncontrolled emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source.

Daktronics submitted its permit application after April 20, 1998. None of Daktronics' operations use a control device to achieve compliance with an emission limit or standard. Therefore, compliance assurance monitoring is not applicable.

4.8 Periodic Monitoring

Periodic monitoring is required for each emission unit that is subject to an applicable requirement at a source subject to Title V of the Federal Clean Air Act. Units that are subject to opacity limits are typically based on periodic visible emission readings. However, in the case of painting operations, historical opacity readings indicate that periodic visible emission readings are not required. Daktronics is required to meet Maximum Achievable Control Technology Standards. The monitoring requirements specified in the federal standards will be required and satisfy periodic monitoring requirements.

4.9 Air Fees

Title V sources are subject to an annual air quality fee. The fee consists of an administrative fee and a per ton fee based on the actual tons per year of pollutant emitted. The air pollutants that are currently being charged a fee include total suspended particulate matter, sulfur dioxides, nitrogen oxides, volatile organic compounds, and hazardous air pollutants. The actual emissions are calculated by the department and are based on information provided by the source.

4.10 Summary of Applicable Requirements

Any source operating in South Dakota that meets the requirements of the Administrative Rules of South Dakota (ARSD) 74:36:05:03 is required to obtain a Title V air quality permit. A major source is defined as having the potential to emit greater than 100 tons per year of a criteria pollutant or greater than or equal to 10 tons per year of a single hazardous air pollutant, or greater than or equal to 25 tons per year of a combination of hazardous air pollutants. A source that is required to comply with federal new source performance standards or national emission standards for hazardous air pollutants must obtain a Title V air quality permit.

Daktronics is a major source for VOCs and HAPs and is subject to national emission standards for hazardous air pollutants. Therefore, Daktronics will be required to operate within the requirements stipulated in the following regulations:

- ARSD 74:36:05 - Operating Permits for Part 70 Sources;
- ARSD 74:36:06 - Regulated Air Pollutant Emissions;
- ARSD 74:36:08 - National Emission Standards for Hazardous Air Pollutants;
- ARSD 74:36:11 - Performance Testing;
- ARSD 74:36:12 - Control of Visible Emissions; and
- ARSD 74:37:01 - Air Emission Fees.

5.0 RECOMMENDATION

Daktronics' potential volatile organic compound emissions and hazardous air pollutant emissions will increase as a result of the proposed modification. Based on the information submitted in the air quality permit application, the department recommends that Daktronics' existing Title V permit be modified to add the Cefla Falcioni Kleenspray automatic paint sprayer. The modifications to the

permit are included in Appendix A. Questions regarding this permit review should be directed to Marlys Heidt, Natural Resources Project Engineer.

Appendix A

Permit Modification

Bold and underline mean an addition and overstrikes mean a deletion to the existing permit. In the case where a permit condition is added or deleted, the permit conditions will automatically be renumbered when the permit is issued.

1.0 STANDARD CONDITIONS

1.1 Operation of source. In accordance with Administrative Rules of South Dakota (ARSD) 74:36:05:16.01(8), the owner or operator shall operate the units, controls, and processes as described in Table #1 in accordance with the statements, representations, and supporting data contained in the complete permit application submitted and dated September 24, 2004, October 14, 2005, October 19, 2005, November 21, 2005, June 13, 2007, ~~and~~ July 3, 2007, **and December 11, 2008,** unless modified by the conditions of this permit. The application consists of the application forms, supporting data, and supplementary correspondence. If the owner or operator becomes aware that it failed to submit any relevant facts in a permit application or submitted incorrect information in an application, such information shall be promptly submitted.

Table #1
Description of Permitted Units, Operations, and Processes

Unit	Description	Control Device
#1	1999 JBI paint booth (Sports) coating operation, Model A-44-PDT-S ¹	None
#2	1994 JBI paint booth coating operation, model AT-40-SB-S ¹	None
#3	1985 Binks contract paint booth coating operation, model CA-544-T ¹	None
#5	1991 Nordson conformal coater, model SCIR2	None
#6	1999 Precision Valve and Automation (PVA) conformal coater, model PVA 2000	None
#8	1999 Vitronics, Soltec Delta Wave, wave soldering machine, model 6622CC	None
#9	1995 PVA potting machine #1, model PVA 1000 / Sheepscot model 9450	None
#10	1995 PVA potting machine #2, model PVA 1000 / Sheepscot model 9450	None
#11	2003 Vitronics, Soltec Wave Solder, wave soldering machine, model 6622CC	None
#12	JB I cross draft paint booth coating operation, model T-50-PDT-S ¹	None
#13	2006 Tekor Series 5000 paint booth, model no. 141650 ¹	None
#14	Tekor Series 5000 cross draft paint booth, model no. TTB-SE-14150-EI-ME ¹	None
#15	<u>2005 Cefla Flacioni Kleenspray automatic paint sprayer, Model 12¹. The sprayer uses an air assisted air mix method of spraying.</u>	<u>None</u>

¹ – Coating operation includes the equipment used to apply cleaning materials to a substrate to prepare it for coating application (surface preparation) or to remove dried coating; to apply coating to a substrate (coating application) and to dry or cure the coating after application; or to clean coating operation equipment (equipment cleaning); all storage containers and mixing vessels in which

coatings, thinners and/or other additives, and cleaning materials are stored or mixed; all manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

5.0 RECORD KEEPING AND REPORTING REQUIREMENTS

5.7 Monthly records. In accordance with ARSD 74:36:05:16.01(9), the owner or operator shall calculate and record the amount of volatile organic compounds, in tons, emitted into the ambient air from the permitted units and fugitive operations during the month and during the 12-month rolling period for that month. The amount of volatile organic compounds emitted to the ambient air from permitted units and fugitive sources shall be based on production records, consumption records, purchase records, etc.

5.12 Periodic reporting. In accordance with ARSD 74:36:05:16.01(9), the owner or operator shall submit a quarterly report to the Secretary by the end of each calendar quarter. Once the facility has successfully demonstrated compliance with the operational limits for four consecutive quarters, the owner or operator may revert to semi-annual reporting if the 12-month rolling total for volatile organic compounds is less than or equal to 50 percent of the plantwide limit for volatile organic compounds. The reporting frequency may revert back to quarterly reporting if there are sufficient data that indicate more frequent monitoring is warranted or the 12-month rolling total is greater than 50 percent of the plantwide limit. The quarterly and semi-annual report shall contain the following information:

- 1. Name of facility, permit number, reference to this permit condition, identifying the submittal as a quarterly or semi-annual report, and calendar dates covered in the reporting period;**
- 2. The quantity of volatile organic compounds, in tons, emitted for each 12-month period in the reporting period and supporting documentation; and**
- 3. A copy of the material safety data sheet, manufacturer supplied formulation data, or EPA approved test method data for any product used at the facility during the reporting period that has not been previously submitted to the Secretary.**

The first quarterly report must be postmarked no later than 30 days after the end of the calendar quarter in which the permit is issued. The remaining reports must be postmarked no later than 30 days after the end of the reporting period.

6.0 CONTROL OF REGULATED AIR POLLUTANTS

6.3 Organic hazardous air pollutant emission limit. In accordance with ARSD 74:36:08:37, as referenced to 40 CFR §§ 63.3890(b), on and after January 2, 2007, the owner or operator shall limit the organic hazardous air pollutant emissions from Units #1, #2, #3, #12, #13, ~~and #14,~~ **and #15** to no more than 0.31 kilograms (2.6 pounds) organic hazardous air pollutant per liter (gallon) coating solids used during each 12-month compliance period. Initial

compliance with this permit condition shall be demonstrated based on the permit conditions in Chapter 8.0 or 10.0. Continuous compliance with this permit condition shall be demonstrated based on the permit conditions in Chapter 9.0 or 11.0.

6.4 Plant wide volatile organic compound emission limit. In accordance with ARSD 74:36:05:16.01(8), the owner or operator shall not emit into the ambient air greater than or equal to 238 tons of volatile organic compounds per 12-month rolling period. The 12-month rolling total shall be calculated every month using that month's value and the previous 11 months' values. The issuance date of this permit shall be the first month of the 12-month rolling period.

12.0 PREVENTION OF SIGNIFICANT DETERIORATION EXEMPTION

12.1 Prevention of significant deterioration review exemption. Any relaxation of the limit in permit condition 6.4 that increases applicable emissions equal to or greater than 238 tons of volatile organic compounds per 12-month rolling period may require a full prevention of significant deterioration review as though construction had not commenced on the source.